September 10, 2015

The Honorable Martha McSally  
Chairwoman  
Emergency Preparedness, Response, and Communications Subcommittee  
House Committee on Homeland Security  
Washington, DC 20515

The Honorable Donald M. Payne, Jr.  
Ranking Member  
Emergency Preparedness, Response, and Communications Subcommittee  
House Committee on Homeland Security  
Washington, DC 20515

Dear Chairwoman McSally and Ranking Member Payne:

On behalf of the National Multifamily Housing Council (NMHC) and the National Apartment Association (NAA), we are writing to respectfully urge you to support the Donovan amendment which will be offered to the legislation entitled, Promoting Resilience and Efficiency in Preparing for Attacks and Responding to Emergencies (PREPARE Act). In addition to including provisions aimed at improving the claims process under the National Flood Insurance Program (NFIP), the Donovan amendment requires FEMA to issue guidance with regard to multifamily property flood mitigation efforts.

For more than 20 years, NMHC and NAA have partnered in a joint legislative program to provide a single voice for America’s apartment industry. Our combined memberships are engaged in all aspects of the apartment industry, including ownership, development, management, and finance. NMHC represents the principal officers of the apartment industry’s largest and most prominent firms. As a federation of more than 170 state and local affiliates, NAA is comprised of over 67,000 members representing more than 7.6 million apartment homes throughout the United States and Canada. The combined spending by the apartment industry and its 36 million residents contributed $1.3 trillion to the U.S. economy and supported 12.3 million jobs in 2013.

As you may know, the Homeowner Flood Insurance Affordability Act (HFIAA) directed FEMA to establish guidelines for property owners to mitigate flood risk in residential buildings, such as apartment buildings or row homes that are unable to utilize traditional mitigation options such as elevation. The statute granted FEMA one year from enactment of HFIAA to issue the mitigation guidance but, to date, FEMA has been unable to do so. The amendment offered by Representative Donovan, among other things, simply requires FEMA to issue this critical guidance within 60 days of enactment of the underlying bill. This common-sense amendment would go to great lengths to assist multifamily property owners in preparing for and mitigating against the risk of future flooding events and damages while allowing them to benefit from flood insurance premium relief for taking such action.
NMHC/NAA strongly support the Donovan amendment to the PREPARE Act as we believe it will help protect both property owners and taxpayers and we urge your support.

Best Regards,

Cindy V. Chetti  
Senior Vice President of Government Affairs  
National Multifamily Housing Council

Greg Brown  
Senior Vice President of Government Affairs  
National Apartment Association

CC: Members of the Emergency Preparedness, Response, and Communications Subcommittee